

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

**Chris Herring Photography LLC; and  
Chris Herring,**

Plaintiffs,

v.

**Mark R. Herring**, in his capacity as Virginia  
Attorney General; and **R. Thomas Payne, II**,  
in his capacity as Director of the Virginia  
Division of Human Rights and Fair Housing,

Defendants.

Case No. 2:20-cv-00353

**Notice of Errata for Complaint in Attorney  
Signature Blocks**

On June 30, 2020, Plaintiffs filed a lawsuit in this Court in the above-referenced matter. The Complaint was filed in error without Plaintiffs' signed Declaration page. *See* ECF No. 1. Attached to this Notice of Errata is a copy of the signed Declaration page.

In addition, there were errors in the signature blocks of the remaining documents regarding the updated law firm name for Steve C. Taylor and the addition of L. Carter Budwell. The correct information is as follows:

Steve C. Taylor  
Virginia Bar No. 31174  
**The Alliance Legal Group, PLLC**  
133 Mount Pleasant Road  
Chesapeake, VA 23322  
(757) 482-5705  
(757) 546-9535 (facsimile)  
stevetaylor@call54legal.com

L. Carter Budwell  
Virginia Bar No. 90593  
**The Alliance Legal Group, PLLC**  
133 Mount Pleasant Road  
Chesapeake, VA 23322  
(757) 455-9590  
(757) 455-9591 (facsimile)  
carter@call54legal.com

Respectfully submitted this 1st day of July, 2020.

Jonathan A. Scruggs  
Arizona Bar No. 030505\*  
**Alliance Defending Freedom**  
15100 N. 90th Street  
Scottsdale, AZ 85260  
(480) 444-0020  
(480) 444-0028 (facsimile)  
jscruggs@ADFlegal.org

David A. Cortman  
Georgia Bar No. 188810\*  
**Alliance Defending Freedom**  
1000 Hurricane Shoals Rd. NE  
Ste. D-1100  
Lawrenceville, GA 30043  
(770) 339-0774  
(770) 339-6744 (facsimile)  
dcortman@ADFlegal.org

Johannes S. Widmalm-Delphonse  
Minnesota Bar No. 396303\*  
**Alliance Defending Freedom**  
20116 Ashbrook Place, Suite 258  
Ashburn, VA 20147  
(571) 707-4655  
(571) 707-4656 (facsimile)  
jwidmalmdelphonse@ADFlegal.org

By: s/ Steve C. Taylor

Steve C. Taylor  
Virginia Bar No. 31174  
**The Alliance Legal Group, PLLC**  
133 Mount Pleasant Road  
Chesapeake VA 23322  
(757) 482-5705  
(757) 546-9535 (facsimile)  
stevetaylor@call54legal.com

L. Carter Budwell  
Virginia Bar No. 90593  
**The Alliance Legal Group, PLLC**  
133 Mount Pleasant Road  
Chesapeake VA 23322  
(757) 455-9590  
(757) 455-9591 (facsimile)  
carter@call54legal.com

ATTORNEYS FOR PLAINTIFFS

\*Admission for *Pro Hac Vice* pending

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of July, 2020, I electronically filed the foregoing paper with the Clerk of Court using the ECF system, and I hereby certify that the foregoing paper will be served via private process server with the Summons and Complaint to the participants:

Mark R. Herring, Attorney General  
Commonwealth of Virginia  
Office of the Attorney General  
202 North Ninth Street  
Richmond, VA 23219

R. Thomas Payne, II, Director  
Civil Rights Unit/SAAG Fair Housing  
Division of Human Rights and Fair Housing  
Office of the Attorney General  
202 North Ninth Street  
Richmond, VA 23219

s/ Steve C. Taylor  
Steve C. Taylor  
*Attorney for Plaintiffs*